State of New Jersey

Department of Environmental Protection

Christine Todd Whitman
Governor

Robert C. Shinn, Jr.
Commissioner

Edward A. Hogan
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

MAR 12 1997

Re: Hexcel Corporation (Hexcel)
Lodi Borough, Bergen County
ISRA Case #86009
Remedial Action Reports Dated: April 26, 1996, July 29, 1996, October 30, 1996 and January 29, 1997.

Dear Mr Hogan:

Please be advised that the New Jersey Department of Environmental Protection (NJDEP) has completed its review of the above referenced Remedial Action Reports. The NJDEP's comments regarding the Remedial Action Reports are noted below:

I Soil Comments

Soil Investigation

1. The proposal to initiate the soil investigation in July of 1998 is unacceptable. The NJDEP considers this delay as yet another unnecessary delay in the case. It should be noted that it has been almost five years since Hexcel has completed any soil remedial activities and four years since the last proposal. Therefore, Hexcel shall, at a minimum, immediately initiate the evaluation of potential soil remedial options for the site and complete the delineation of the elevated levels of contaminants detected on site to their respective impact to ground water and residential soil cleanup criteria. There is no technical rationale for the deferment of the aforementioned activities. Be advised that the NJDEP will no longer tolerate unnecessary delays in the remediation of the Hexcel site. Hexcel shall submit a revised Remedial Action Schedule (RAS) which includes a timeframe for immediate initiation of the soil investigation required to remediate the soil contamination detected at the Hexcel facility.

Off-site Soil Sampling

2. Be advised that during the course of the investigation at the adjacent Napp Technologies, Inc. facility, surficial off-site soil samples were collected immediately outside the fence of the Hexcel facility on Molnar Drive. Elevated levels of PAHs and Polychlorinated biphenyls (PCB) were detected in these soil samples. Further be advised that based on pending additional information required by the NJDEP from Napp Technologies, Inc. concerning these soil samples, Hexcel will be required to address these areas if the NJDEP determines that the contamination detected is related to the contamination previously detected at the Hexcel facility. The NJDEP expects to receive this information by April 1, 1997.

PCB Contaminated Soils

3. Be advised that if during the course of the investigation soils containing concentrations of greater than 50 part per million (ppm) are detected, remediation of these soils will be required. This requirement is based on the United States Environmental Protection Agency's Chief Judicial Officer's August 3, 1990 ruling (Standard Scrap Metal Company, Inc., TSCA Appeal No. 87-4) that soils contaminated with 50 ppm or more of PCBs require remedial measures implemented in compliance with the Toxic Substance Control Act (TSCA) and its implementing regulations in 40 CFR 761 et seq. In effect, this ruling disallowed an exemption from remediation and disposal requirements for PCBs discharged prior to the April 18, 1978 enactment of TSCA.

The NJDEP has received policy guidance from the USEPA (enclosed) regarding the USEPA's December 6, 1994 proposed revision to the TSCA rules which allow for PCBs to be left in place on a case-by-case basis. The proposed rules clarify the CJO's decision by announcing that the USEPA presumes that all PCBs released into the environment prior to 1987 were disposed of in a manner which does not present a risk of exposure unless the USEPA makes a finding, on a case-by-case basis, that there is such a risk. Although the proposed rules have no standing until adoption, USEPA's policy guidance provides a strategy, modeled after the proposed rules, which allow PCB concentrations at or above 50 ppm to remain in place when restricted access would be expected.

Therefore, if Hexcel proposes to leave PCBs at concentrations greater than 50 ppm, Hexcel shall submit to the USEPA and receive USEPA approval for such a proposal.

Stream Sediment Sampling

4. Hexcel's proposal for no further action is unacceptable. Hexcel has proposed to utilize the sediment samples collected by the adjacent Napp Technologies, Inc. facility in lieu of collecting their own samples to address the discharge from the storm sewer at the Hexcel facility. This unacceptable for two reasons. First, the collection of only one downstream sample is not sufficient to address a discharge from an outfall into the river. Secondly, the samples collected by Napp Technologies, Inc. were collected to address the discharge from the Napp Technologies, Inc.'s storm sewer discharge and not the discharge from Hexcel's storm sewer. Further, be advised that pursuant to Hexcel's March 25, 1987 correspondence to the NJDEP, Hexcel's storm drain pipe was traced to an outfall into the Saddle River approximately 900' downstream of the facility. The samples collected by Napp Technologies, Inc. do not address this outfall. In addition, in Hexcel's proposal to utilize the samples collected by Napp Technologies, Inc., Hexcel makes no mention of the discharge from their storm sewer system only the discharge from the Napp Technologies, Inc. facility. Therefore, Hexcel shall collect sediment samples pursuant to the Technical Requirements for Site Remediation and the recent article on Ecological Risk Assessment in the January 1997 Site Remediation News (copy enclosed) to address the discharge from Hexcel's storm sewer system.

II .Ground Water Comments

5. In the NJDEP's June 12, 1995 letter, the NJDEP indicated that observation of product on the interface probe should trigger an attempt to recover product at the corresponding well. Hexcel shall clarify whether dense non aqueous phase liquid (DNAPL) recovery was attempted at wells where DNAPL was observed on the probe, but no thickness of DNAPL was measured.

6. The NJDEP requires horizontal and vertical delineation of ground water contamination to the Ground Water Quality Standards. Without complete delineation, Hexcel cannot determine the extent of hydraulic capture needed, and will not have sufficient monitoring points to demonstrate that adequate capture is being achieved. Therefore, the delineation of contamination detected at down-gradient monitoring wells MW22 and MW31 is necessary since MW22 and MW31 contained 405 ppm total target volatile organic compounds (VOCs) and 35 ppm total target VOCs, respectively, in the most recent round collected (July, 1993). Be advised, that the adjacent Napp Technologies, Inc. facility has initiated a ground water investigation. The wells installed at the Napp Technologies, Inc. facility may potentially aid in accomplishing the required delineation. The NJDEP would allow the use of the Napp Technologies, Inc. monitoring wells for the horizontal delineation required down gradient of monitoring wells MW22 and MW31 provided Napp Technologies, Inc. is willing to allow Hexcel access for sampling and water elevation measurements and provided Hexcel demonstrates that the Napp Technologies, Inc. monitoring wells are suitably located and constructed for the required delineation. Specifically, the NJDEP would expect Hexcel to demonstrate that the Napp Technologies, Inc.'s monitoring wells were screened within the appropriate unit through examination of construction specifications and drilling logs and that the Napp Technologies, Inc.'s wells were located down gradient to MW22 and MW31 via the construction of ground water contour maps using water elevation data from wells at both sites.

7. Hexcel proposes to install a deep well rather than a bedrock well at MW1 for vertical delineation, because Hexcel believes that MW1 is a shallow overburden well rather than a deep overburden well. The proposal is conceptually acceptable to the NJDEP as vertical delineation to the Ground Water Quality Standards within the overburden would preclude the need for a bedrock investigation. However, if this does not accomplish delineation, Hexcel will be required to install bedrock wells.

8. After MW26 had been installed, for reasons that are not explicitly documented, the well was referred to as a deep overburden well. The well was sampled once in December, 1990 and was found to contain approximately 148 ppm target VOCs. DNAPL has also been detected in this well. In subsequent letters, the NJDEP referred to MW1 as being the most contaminated deep overburden well at the site, having contained target VOCs at totals of up to approximately 15 ppm. This apparent error went unchecked by Hexcel. After reviewing Hexcel's recent submittal, wherein Hexcel states that MW26 should not be considered a deep well because it did not penetrate the clay layer believed to extend across the site, the Department reviewed cross sections submitted by Hexcel in the August, 1991 progress report (refer to cross section A-A'). The cross section containing MW26 appears to indicate that MW26 extended below the depth at which the clay layer would be expected, and therefore, a clay layer may be absent in this location. Therefore, vertical delineation in this location is required. In general, a deeper investigation is warranted anywhere at the site where such concentrations

are present yet no direct or indirect evidence of the vertical limit of contamination is available.

9. The proposal to not replace MW32 is unacceptable. Hexcel believes that MW4, MW27 and MW21 adequately monitor this area, however, these wells do not define the limit of contamination. As MW32 was installed for horizontal delineation, but itself contained approximately 11 ppm total target VOs the last time it was sampled (April, 1992), installation of a replacement well further down-gradient is required.

10. Hexcel's proposal to resolve whether MW08 can be used to confirm that DNAPL has not migrated under the Saddle River before proposing an alternate means of investigation across the river is acceptable. Be advised that if the Army Corps of Engineers fails to supply Hexcel with the requested information within a reasonable amount of time, Hexcel shall conduct its investigation across the river as previously required.

11. Hexcel shall demonstrate that ground water contamination has been delineated to the Ground Water Quality Standards by submitting a detailed and comprehensive evaluation of ground water sampling results, including the occurrence of product, ground water flow directions, the occurrence of low-permeability units and the occurrence of subsurface structures such as basement floors and unidentified concrete structures encountered during drilling.

12. Hexcel has indicated that a proposal for Saddle River sampling will be submitted with the permanent recovery system proposal. This is acceptable to the NJDEP.

III General Requirements

13. Be advised that a site inspection by the NJDEP is required. Therefore, Hexcel shall contact the Case Manager to schedule a site inspection at the Hexcel facility.

14. Hexcel shall submit a revised Remedial Action Schedule, pursuant to N.J.A.C. 7:26E-6.5, for NJDEP approval which includes all tasks associated with the remediation of the site within thirty (30) calendar days of the receipt of this letter.

15. Hexcel shall submit summarized analytical results in accordance with the Technical Requirements For Site Remediation, N.J.A.C. 7:26E.

16. Hexcel shall collect all samples in accordance with the sampling protocol outlined in the May, 1992 edition of the NJDEP's "Field Sampling Procedures Manual".

17. Hexcel shall notify the assigned BEECRA Case Manager at least 14 calendar days prior to implementation of all field activities included in the Remedial Action Workplan. If Hexcel fails to initiate sampling within 30 calendar days of the receipt of this approval, any requests for an extension of the required time frames may be denied.

18. On February 22, 1994, the NJDEP promulgated the ISRA Fee Rule amendments at 26 N.J.R. 1142, which were proposed on April 5, 1993 at 25 N.J.R. 1375. Pursuant to the fee rule amendments, the NJDEP will bill an owner or operator according to the direct billing formula at N.J.A.C. 7:26B-1.10(f)2. At this time, the NJDEP intends to process bills on a semi-annual basis. The NJDEP encourages responsible parties to use the "Technical Requirements for Site Remediation" (N.J.A.C. 7:26E) as well as any other current NJDEP guidance documents to assist in remediation activities and thereby minimize NJDEP review time. The complexity of the environmental contamination at the site and the quality of the workplans and reports submitted to the NJDEP will dictate the oversight costs to the regulated community.

19. Pursuant to N.J.S.A. 58:10B-3, a remediation funding source is to be established in an amount equal to or greater than the cost estimate of the implementation of the remediation and shall be in effect for a term not less than the actual time necessary to perform the remediation at the site. N.J.S.A. 58:10B-3 allows for a change of the amount in the remediation funding source as the cost estimate changes. Please provide the current estimated cost of the remaining remediation required at the site. Any increases in the estimated cost estimate will require an increase in the amount in the Remediation Funding Source to an amount at least equal to the new estimate. Any requests to decrease the amount in the remediation funding source will be reviewed and approved by the NJDEP upon a finding that the current remediation cost estimate will be sufficient to fund all necessary remediation.

If you have any questions, please contact the Case Manager, Joseph J. Nowak, at (609) 292-0130.

Sincerely,

Maurice Migliarino, Section Supervisor
Bureau of Environmental Evaluation
and Cleanup Responsibility Assessment

c: Beverly Phillips, BGWPA
A. William Nosil, Hexcel Corporation
James Higdon, Fine Organics Corporation
Steve Tiffinger, Bergen County Department of Health Services
Joseph Dominic, Municipal Manager, Borough of Lodi
Philip V. Toronto, Mayor, Borough of Lodi